

Honorable Marc Barreca
Chapter 7
Hearing Location: ZoomGov
Hearing Date: September 13, 2023
Hearing Time: 10:00 AM
Response Date: September 6, 2023

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

In re: : Chapter 13 Proceeding
:
WAYNE RICHARD PELUSO and : Case No.: 23-11187-MLB
RONI SUE PELUSO, :
: DECLARATION OF DEBTOR
Debtor(s). : IN SUPPORT OF MOTION
: TO AVOID JUDGMENT LIEN
:
:

My name is Roni Sue Peluso and I write this declaration in support of my motion to avoid a judgment lien against my home.

1. On June 29, 2023, I filed this Chapter 7 bankruptcy.

2. I own a home located at 6286 Music Place, Maple Falls, Washington which had a fair market value of \$ 137,203.00 when I filed this bankruptcy.

3. I was living in my 6286 Music Place home when I filed this bankruptcy and I continue to live there.

4. I do not owe a mortgage on the 6286 Music Place home.

5. I listed my 6286 Music Place home on my bankruptcy schedules and claimed it as exempt.

6. On April 9, 2021, Midland Credit Management, Inc. obtained a default judgment against me in Whatcom County District Court (Case No.CV20-1624). The total judgment

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1 amount is \$22,437.73. The default judgment was recorded with the Whatcom County Auditor
2 under recording number 2023-0601078 on June 14, 2023.
3

4 7. I listed Midland Credit Management, Inc. as a creditor in my bankruptcy schedules.

5 8. I respectfully request that the court avoid and cancel Midland Credit Management,
6 Inc.'s judgment lien against my home.

7 I have read my motion to avoid judgment lien and declare under penalty of perjury that
8 all the statements contained therein, as well as all the statements contained in this declaration, are
9 true and correct.
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11 *Date: 08/01/2023*

/s/ Roni Sue Peluso

Roni Sue Peluso, Debtor
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